

CJF8.22.20
RPG/DL USAO 2020R00292

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**JIMMIE MARTIN
(A/K/A "DOODLES"),**

Defendant

CRIMINAL NO. ELH-20-272

**(Possession of a Firearm and
Ammunition by a Prohibited Person,
18 U.S.C. § 922(g)(1); Possession with
the Intent to Distribute a Controlled
Substance, 21 U.S.C. § 841(a);
Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime, 18 U.S.C. § 924(c); Forfeiture,
18 U.S.C. § 924(d), 28 U.S.C. § 2461(c),
21 U.S.C. § 853)**

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

On or about March 6, 2020, in the District of Maryland, the defendant,

JIMMIE MARTIN,

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, a Glock Model 17, 9 millimeter caliber handgun, bearing Serial Number NLD171; a Glock magazine having the capacity to hold 30 cartridges of ammunition; and 29 cartridges of ammunition, including 1 cartridge of Winchester ammunition, 1 cartridge of Remington ammunition, 1 cartridge of Prvi Partizan ammunition, 9 cartridges of Fiocchi ammunition, and 17 cartridges of Federal Cartridge ammunition. The firearm and ammunition were in and affecting interstate and foreign commerce.
18 U.S.C. § 922(g)(1)

COUNT TWO

(Possession with the Intent to Distribute a Controlled Substance)

The Grand Jury for the District of Maryland further charges that:

On or around March 6, 2020, in the District of Maryland, the defendant,

JIMMIE MARTIN,

did knowingly and intentionally possess with the intent to distribute a substance containing a detectable amount of cocaine, a Schedule II Controlled Substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2

COUNT THREE

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

The Grand Jury for the District of Maryland further charges that:

The allegations set forth in Counts One and Two are hereby incorporated by reference.

On or around March 6, 2020, in the District of Maryland,

JIMMIE MARTIN

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, possession with the intent to distribute cocaine, as charged in Count Two of this Indictment, which is incorporated by reference herein.

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 2

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. All allegations set forth in Counts One, Two, and Three are hereby incorporated by reference.
2. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 28 U.S.C. § 2461(c) and the other statutes cited herein, in the event of the defendant's convictions.

Narcotics Forfeiture

3. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Count Two, the defendant convicted of such offense, shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

Firearms and Ammunition Forfeiture

4. Pursuant to 18 U.S.C. § 924(d), upon conviction of an offense alleged in Count One, the defendant convicted of such offense shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in those offenses.

Substitute Assets

5. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant(s) up to the value of the property charged with forfeiture in the paragraphs above.

Property Subject to Forfeiture

- 6. The property to be forfeited includes, but is not limited to, the following:
 - (a) Glock Model 17, 9 millimeter caliber handgun, bearing Serial Number NLD171; a Glock magazine having the capacity to hold 30 cartridges of ammunition; and approximately 29 cartridges of ammunition, including approximately 1 cartridge of Winchester ammunition, approximately 1 cartridge of Remington ammunition, approximately 1 cartridge of Prvi Partizan ammunition, approximately 9 cartridges of Fiocchi ammunition, and approximately 17 cartridges of Federal Cartridge ammunition.

18 U.S.C. § 924(d)
28 U.S.C. § 2461(c)
21 U.S.C. § 853

Robert K. Hur /s/ DAL

Robert K. Hur
United States Attorney

A TRUE BILL:

'Foreperson'

8/25/2020

Date